Appln. No. 09/994,544
Amdt. dated Feb. 15, 2005
Reply to Office Action of Nov. 16, 2004
Docket No. DE9-2C00-0031 (267)

REMARKS/ARGUMENTS

These remarks are made in response to the Office Action of November 16, 2004

(Office Action). Claims 1, 3, 8 and 13 were amended and claims 1-19 remain in the

application.

In paragraphs 1-2, claims 1 and 13 were rejected under 35 U.S.C. § 102(b) as

being unpatentable over U.S. Patent No. 5,515,490 to Buchanan, *et al.* (Buchanan).

Buchanan discusses a method and system for temporally formatting data presentations in

time-dependent documents.   The main focus of Buchanan is the generation and

scheduling of time-dependent multi-media presentations and therefore the structural

information in Buchanan is primarily the temporal metadata of the media item. As the

examiner on p. 16 of the second office action noted in mapping the limitations to

Buchanan to Applicants' limitations:

"Representation = Media item itself ...

Structural Information = Media Description Data, i.e. the temporal metadata of the
Media item ...

Realization = The actual time line of the full document ..."

As this mapping suggests, the crucial aspect of the structural information in

Buchanan is the temporal metadata of the Media item.   In contrast, besides the

differences previously pointed out and argued in the Applicants' previous office action

response, the structural information used in association with the first and second

representations are more of a semantic structure of the representation that is only ordered

and otherwise completely free from temporal information as required in Buchanan. More specifically, as recited in the claims, the applicant uses semantic structural information of the representations (e.g., for a book, the structure can be sentence, paragraph, subchapter, chapter, etc.) to align the structure of the "original" version to the "translated" version. For example, for a novel and its translation into another language, the simple assumption could be made that a sentence in the original version will be translated into just one sentence, neither split into two nor merged with another sentence. The method in accordance with an embodiment of the present invention can then synchronize the original version of the representation (e.g., the novel) with the realization (e.g., the audio-book of the novel). Guided by the semantic (non-temporal) document structure (sentence, paragraph, etc.), the first representation content of equivalent structural elements can be replaced with the second representation content to end up with multi-lingual subtitles for example. In this regard, Applicants have amended Claims 1, 3, 8 and 13 to emphasize this difference since Buchanan fails to teach and certainly fails to suggest, mention or contemplate, the use of semantic structures or non-temporal semantic structures to enable alignment and synchronization as contemplated herein.

Buchanan, in particular, discusses a method of automatically providing a temporal format for a multimedia document that also produces a consistent schedule for media items having unpredictable behavior. This is especially important for the effective production of interactive multimedia documents, which are used in a variety of

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environments such as education. In this regard, Buchanan refers to formatting first and second media items. Buchanan only has first and second temporally related media items. Again, Buchanan does not appear to teach or suggest the steps of determining semantic structure information in the first and second representations or the non-temporal structure association between the first and second representations. Finally, there is no teaching of synchronizing the second representation with the first representation using the semantic structure association information (between the first and second representations). Thus, the Applicants respectfully submit that claims 1 and 13 are novel and non-obvious in view of Buchanan.

Regarding paragraphs 3 and 4 of the Office Action, claims 2-3 and 14-15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchanan in view of the publication entitled "Synchronization Relation Tree: A Model for Temporal Synchronization in Multimedia Presentation" by Kim, *et al.* (Kim). Although Kim appears to be applicable to multimedia presentations, such combination still fails to obviate the claims of the present invention due to the noted deficiencies in Buchanan noted above. Furthermore, the Examiner asserts that data structures that contain pointers to data corresponding to nodes rather than the data itself reads on tree locators, yet such a specific teaching of providing a stream of tree locators resulting from the analysis of the semantic structure information of the first representation and the second representation is not found in Kim. Further note that the Examiner points to language in Kim regarding

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"temporal relationship consistency" to provide the motivation to combine. As noted above, the Application has been amended to include semantic structures rather than temporal structures to clearly further distinguish the claims of the present invention with those of the cited art.

Regarding paragraph 5 of the Office Action, claims 4-5 and 16-17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchanan in view of Kim, and another publication, "Cooperative Use of MHEG-5 and HyTime" by Rutledge, *et al.* (Rutledge). Once again, such combination still fails to obviate the claims of the present invention due to the noted deficiencies in Buchanan and Kim noted above and further in the view that Rutledge further fails to suggest, mention or contemplate a web of relations as recited in the claims of the present invention. Claim 4 in particular recites aligning at least one version of content (of the realization) with the first representation to produce a web of relations. In paragraph 2 of section 2 of Rutledge, there is discussion of two attributes that enable one element to refer to one another. Applicants once again assert that this fails to suggest the web of relations between a version of content of a relation and a first representation as claimed in the present invention.

Regarding paragraph 6 of the Office Action, claims 6 and 18-19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchanan in view of Kim, U.S. Patent No. 5,731,847 to Tsukagoshi, *et al.*, (Tsukagoshi), and to U.S. Patent 5,794,197 to Alleva, *et al.* (Alleva) and finally in view of the publication "Using the Strategy Design

Pattern to Cornpose Reliable Distributed Protocols", by Garbinato, *et al.* (Garinato). Once again, such combination fails to obviate the claims of the present invention due to the noted defi:iencies in Buchanan and Kim noted above. Furthermore, Applicants believe that th3re is no demonstrated suggestion or motivation to combine in order to obviate the claims of the present invention. In any event, even if one were to combine such references, such combination still fails to suggest, mention or contemplate the realization, the first representation, and the second representation using the semantic structure as recited in the amended claims.

Regarding paragraphs 7-12, the Applicants once again reiterate the arguments provided abov:, particularly in the reliance of the Buchanan and Kim references. Other references in the Office Action by the Examiner have been reviewed, but do not appear to further affect tae patentability of the claims of the present invention.

In light of the foregoing, withdrawal of the 35 U.S.C. §§ 102(b) and 103(a) rejections with respect to the claims is respectfully requested. As none of the references either singly, nor in any combination thereof, teaches or suggests the features of the present invention as claimed as amended, withdrawal of the rejections regarding claims 1-19 is once again respectfully requested.
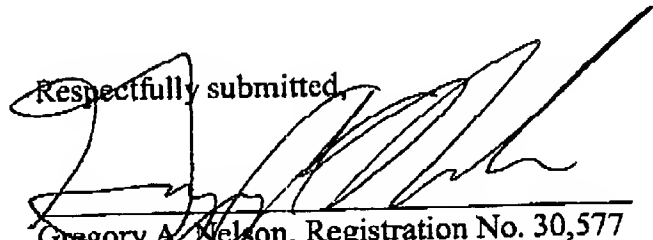
The Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Response, or if the

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Appln. No. 09/994,?44
Amdt. dated Feb. 1?, 2005
Reply to Office Action of Nov. 16, 2004
Docket No. DE9-2000-0031 (267)

Examiner believes a telephone interview would expedite the prosecution of the subject

application to completion.

Respectfully submitted,

Date: 2/15/05

Gregory A. Nelson, Registration No. 30,577
Pablo Meles, Registration No. 33,739
Brian K. Buchheit, Registration No. 52,667
AKERMAN SENTERFITT
Customer No. 40937
Post Office Box 3188
West Palm Beach, FL 33402-3188
Telephone: (561) 653-5000

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